

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO, *et al.*,

Plaintiffs,

v.

GREGORY W. ABBOTT, *et al.*,

Defendants.

Civil Action No. 5:21-cv-844 (XR)
(Consolidated Cases)

STIPULATED DISCLOSURE DEADLINE FOR GENERAL ELECTION WITNESSES

Pursuant to this Court’s standing instruction, *see* Fact Sheet for Judge Xavier Rodriguez ¶ 34, all parties have agreed that by **February 24, 2023**, they will complete disclosure of individuals likely to have discoverable information with respect to the November 2022 General Election—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.

DATE: January 24, 2023

Respectfully submitted,

KRISTEN CLARKE
Assistant Attorney General
Civil Rights Division

ELISE C. BODDIE
Principal Deputy Assistant Attorney General
Civil Rights Division

/s/ Daniel J. Freeman
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CERTIFICATE OF CONFERRAL

Pursuant to Local Rule CV-7(G), I hereby certify that over several dates in December 2022 and January 2023, my co-counsel and I conferred with counsel for Plaintiffs, Defendants, and Intervenors in this action regarding the above stipulation. All parties have consented.

/s/ Daniel J. Freeman

Daniel J. Freeman
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CERTIFICATE OF SERVICE

I hereby certify that on January 24, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of this filing to counsel of record.

/s/ Daniel J. Freeman

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